

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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AVEMARIA THOMPSON,

Plaintiff,

Civ. No.: 14-2473(ADS)(KMT)

-against-

THOMAS J. SPOTA, ROBERT EWALD,
and KATHLEEN WAGNER,

AFFIRMATION OF JASON
L. SOLOTAROFF IN SUPPORT
OF MOTION FOR LEAVE
TO FILE FIRSTAMENDED
COMPLAINT

Defendants.

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JASON L. SOLOTAROFF, under penalty of perjury, affirms,

1. I am the attorney representing Plaintiff in this matter and submit this affirmation in support of her motion for leave to file an amended complaint.
2. On July 17, 2014, I provided counsel for Defendants the draft amended complaint, attached hereto as Exhibit A, in an effort to obtain Defendants' consent for the amendment.
3. On July 28, 2014, counsel for Defendants informed me that Defendants could not consent to the amendment.
4. Attached hereto as Exhibit B is a true copy of the complaint originally filed in this action.
5. Attached hereto as Exhibit C is a true copy of page 1 of the Verified Complaint filed on behalf of Plaintiff before the New York State Division of Human Rights ("NYSDHR").
6. Attached hereto as Exhibit D is a true copy of a letter to Plaintiff from the NYSDHR, dated October 2, 2013.

7. Attached hereto as Exhibit E is a true copy of the NYSDHR Determination After Investigation, dated March 21, 2014.

8. Attached hereto as Exhibit F is a true copy of the NYSDHR Notice and Final Order, dated June 25, 2014.

9. Attached hereto as Exhibit G is a true copy of the EEOC Right to Sue Letter, dated July 1, 2014.

10. Attached hereto as Exhibit H is a true copy of the letter from Mary Ellen Donnelly, dated July 9, 2014, so ordered by the Court July 10, 2014.

I declare under penalty of perjury pursuant to 28 U.S.C. §1746 that the foregoing is true and correct to the best of my knowledge.

Dated: August 6, 2014

/s

JASON L. SOLOTAROFF